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U.S. DEPARTMENT OF JUSTICE
Environment & Natural Resources
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

PAUL G. SHEARER)	
)	
Plaintiff,)	
)	
V.)	3:03-cv-0263-CV-JKS
)	(Consolidated)
UNITED STATES OF AMERICA,)	
GALE NORTON, Secretary of the)	
Interior, the DEPARTMENT OF)	
THE INTERIOR, the NATIONAL)	MOTION OF THE UNITED STATES
PARK SERVICE.)	FOR ENLARGEMENT OF TIME
)	
Defendants.)	
)	

The United States of America, Dirk Kempthorne, Secretary of the Interior; the Department of the Interior; and the National Park Service, move the Court for an order granting them an enlargement of time to and including May 21, 2007, in which to file a response to the Second Amended Complaint (Docket Entry No. 114).

I support of the above motion, the United States shows:

1. Pursuant to the Order (Docket Entry No. 110), plaintiff Paul G. Shearer was granted leave to file a Second Amended Complaint. This order at 3 provides that the Government may present any objections to this complaint in a motion to dismiss.

The Second Amended Complaint (Docket Entry No. 114) was served on defendants on April 6, 2007. Defendants' response to this complaint is due April 20, 2007.

2. Defendants have extensive specific objections it wishes to file to Second Amended Complaint. Given the extensive nature of Defendants objections, additional time is needed to prepare and file the appropriate motion to dismiss.

3. The requested additional time may also permit defendants to determine the extend to which a response to the Second Amended Complaint is even needed. The parties have recently exchanged settlement proposals that could possibly lead to a settlement of some of the claims encompassed within the Second Amended Complaint.

Dated this 20th day of April, 2007.

s/ Dean K. Dunsmore
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of April, 2007, a copy of the foregoing Motion of the United States for Enlargement of Time together with a proposed Order were served by placing said copies in a postage prepaid envelope, addressed to that person at the place and address stated below, and by depositing said envelope and contents in the United States mail at Anchorage, Alaska.

Paul G. Shearer
Kathryn A. McCready
1532 Meadows Drive
Lake Oswego, Oregon 97034

s/ Dean K. Dunsmore

Dean K. Dunsmore